UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ALEXANDRE PELLETIER, Individually and on Behalf of All Others Similarly Situated, Plaintiff, vs. ENDO INTERNATIONAL PLC, et al., Defendants.	Civ. Action No. 2:17-cv-05114-MMB CLASS ACTION Honorable Michael M. Baylson DECLARATION OF ALEXANDRE PELLETIER IN SUPPORT OF MOTION FOR FINAL APPROVAL OF SETTLEMENT, PLAN OF ALLOCATION, AWARD OF ATTORNEYS' FEES AND EXPENSES, AND AWARD TO LEAD PLAINTIFF

I, Alexandre Pelletier, hereby declare as follows:

1.   I submit this declaration to provide the Court with a description of my efforts in pursuit of this action, and to express my support for the proposed Settlement of this Action.

2.   I have personal knowledge of the matters attested to in this Declaration.

3.   I have been involved in this action since November 14, 2017, when I filed the initial complaint in this action. On February 4, 2021, the Court appointed me, along with Nathan Dole, as Co-Lead Plaintiffs in this Action, and appointed Bucks County Employees' Retirement Fund as Lead Plaintiff. On May 20, 2021, the Court appointed us as Co-Lead Class Representatives.

4.   I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 ("PSLRA").

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5.   I have personal knowledge of the matters set forth in this Declaration, as I have been directly involved in monitoring and overseeing the prosecution of the Action, as well as the negotiations leading to the Settlement.

6.   I frequently corresponded with Co-Lead Counsel at Pomerantz LLP ("Co-Lead Counsel") throughout the pendency of this case. They kept me up to date on the developments in this Action.

7.   I provided Co-Lead Counsel with records of my trades in Endo common stock, which were produced to Defendatns in this action. In addition, I spoke and emailed with Co-Lead Counsel extensively to respond to Defendants' discovery requests and to prepare for my deposition. I was deposed by Defendants in connection with my seeking appoiontment as a Class Representative.

8.   I reviewed the key filings in this Action that I received from Co-Lead Counsel, including the initial and amended complaints, the Court's order on Defendants' motion to dismiss (all of which took place before I was appointed as Co-Lead Plaintiff), briefing and the Court's orders on class certification, briefing on summary judgment, and documents related to this proposed Settlement, among other case materials that Co-Lead Counsel sent to me. I also independently followed this litigation and news about Endo based on publicly available information. In addition, I conferred with Co-Lead Counsel about whether to agree to the Settlement.

9.   I estimate that I expended a total of approximately 400 hours pursuing the claims in this action since 2017. I devoted extra time and effort to reviewing the key documents related to this matter because I am not a native English speaker and therefore took a significant amount of time to have documents translated to French.

10.   I therefore devoted significant time to representing the Class in my capacity as Co-Lead Plaintiff in this Action, which was time that I otherwise would have spent on other activities. I am respectfully requesting reimbursement in the amount of $17,000 for the time I devoted to participating in this Action, which was necessary to help achieve an excellent result for the Class. This is extremely fair and reasonable for the amount of time and effort that I devoted to this litigation, especially considering my qualifications and compensation in my job as a Conseiller Gestion de Contrat (contract management advisor) for a utility company.

11.   I fully support the proposed Settlement of this Action and believe that it is an excellent result for the Class.

12.   I take seriously my role as Class Representative to ensure that the attorneys' fees are fair in light of the result achieved for the Class and reasonably compensate Class Counsel for the work involved and the substantial risks they undertook in litigating the Action. I evaluated Class Counsel's free request by considering the work performed and by considering the substantial recovery obtained for the Class.

13.   I fully support the Settlement for $63.4 million. This is an excellent result achieved by counsel, when considering the strengths and weaknesses of the claims and the risks and considerable costs in time and expenses if the Action were to continue.

14.   I support the requested award of attorneys' fees in the amount of 25% of the Settlement Amount. This requested fee is reasonable in light of the expertise of legal counsel, the amount of work that they performed towards successful resolution of the Action against Defendants, the complexity of prosecuting the Action, the large out-of-pocket expenses that they incurred, and the fact that the case has been pursued at enormous risk with no guarantee of recovery.

15.   I also support reimbursement of attorneys' expenses as requested, as I believe these expenses to have been reasonably incurred by legal counsel in the course of prosecuting the Action on the Settlement Class' behalf.

16.   In sum, I respectfully request that the Court approve the Settlement, grant a compensatory award of $17,000 to me in light of my time and effort expended in pursuing the Action, and approve the attorneys' fee request of 25% percent of the Settlement Amount and full reimbursement of legal expenses.

I declare under penalty of perjury that the foregoing facts are true and correct.

Executed this 11 day of January, 2022.

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Alexandre Pelletier